

FILED

SEP 16 2025

U.S. DISTRICT COURT
INDIANAPOLIS, INDIANA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,) Cause No. 1:23-cr-00123-JRS-MG
v.)
RAMIRO RICO DE LEON)
a/k/a Rami,) -01
GREGORY HENDERSON, JR.)
a/k/a Grego a/k/a Whitey,) -02
OCTAVIO VICENCIO,) -03
ERICK FOSTER,) -04
GEORGE TAYLOR,) -05
DONTORIA GILBERT,) -07
DAVID BENNETT,) -08
MICHAEL SANDERS)
a/k/a Lil Mike,) -14
LANDON JONES)
a/k/a The Comedian,) -17
TYRONE BELL,) -21
ERNEST YOUNG,) -26
THOMAS RAYFORD)
a/k/a Tayda,) -29
REMY ADAMS) -30
a/k/a June, and)
TITUS LAWLER,) -31
Defendants.)

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT ONE
21 U.S.C. §§ 841(a)(1) and 846
Conspiracy to Possess with Intent to Distribute and to Distribute
Controlled Substances

Beginning at a date unknown to the grand jury, but no later than November 2022 and continuing up to and including August 31, 2023, in the

Southern District of Indiana and elsewhere, RAMIRO RICO DE LEON a/k/a Rami, GREGORY HENDERSON, JR. a/k/a Grego a/k/a Whitey, OCTAVIO VICENCIO, ERICK FOSTER, GEORGE TAYLOR, DONTORIA GILBERT, DAVID BENNETT, Gregory Easter, Lauren Eggert, and Quoshawn Stewart, defendants herein, did knowingly conspire together and with diverse other persons, known and unknown to the Grand Jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

OBJECTS OF THE CONSPIRACY

The charged conspiracy had the following objects:

1. The distribution of 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (“fentanyl”), a Schedule II, controlled substance.
2. The distribution of 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.
3. The distribution of five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, that is to distribute controlled substances, the members of the conspiracy did commit, among others, the following overt acts:

1. On December 9, 2022, RAMIRO RICO DE LEON and GREGORY HENDERSON over WhatsApp, with HENDERSON reconfirming that he needed high-quality controlled substances to continue to come in to him, and with RICO DE LEON confirming he would continue to say the same.

2. On or about May 4, 2023, Quoshawn Stewart, at GREGORY HENDERSON's direction, drove HENDERSON to Ohio so that HENDERSON could obtain more controlled substances from an individual.

3. On or about May 21, 2023, DONTORIA GILBERT and DAVID BENNETT spoke to GREGORY HENDERSON on the phone; in this call, GILBERT and BENNETT requested nine ounces of cocaine, and GREGORY HENDERSON indicated that he did, and would charge them \$5,500 for them to obtain it from HENDERSON.

4. On or about May 24, 2023, Lauren Eggert and Gregory Easter called GREGORY HENDERSON to inform him that Gregory Easter was in the custody of the Marion County Jail, but that Lauren Eggert would be taking over his drug trafficking business until he was released, and that GREGORY HENDERSON should continue to distribute controlled substances to Lauren Eggert at the present time.

5. In the course of the conspiracy, J.C. Smith assisted GREGORY HENDERSON in his drug trafficking activities, such as on May 31, 2023, when J.C. Smith obtained an ounce of a controlled substance so that he could give it to HENDERSON and HENDERSON could sell it.

6. On June 15, 2023, GEORGE TAYLOR drove GREGORY HENDERSON to Ohio to see ERICK FOSTER and get controlled substances from FOSTER (which FOSTER had previously received via RAMIRO RICO DE LEON).

7. On or about July 17, 2023, OCTAVIO VICENCIO distributed fentanyl to GREGORY HENDERSON, which VICENCIO had previously received through RAMIRO RICO DE LEON.

8. On or about August 1, 2023, at the direction of RAMIRO RICO DE LEON, GREGORY HENDERSON sent GEORGE TAYLOR to Ohio to deliver 500 grams of fentanyl; this fentanyl was seized by law enforcement.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO
18 U.S.C. § 1956(h)
Conspiracy to Launder Monetary Instruments

From in or about March 2023 through August 31, 2023, the exact dates being unknown to the Grand Jury, in the Southern District of Indiana and elsewhere, RAMIRO RICO DE LEON a/k/a Rami and GREGORY HENDERSON JR. a/k/a Grego a/k/a Whitey, defendants herein, did knowingly conspire together and with diverse other persons known and unknown to the Grand Jury to knowingly and intentionally conduct and attempt to conduct financial transactions, knowing that the property involved in the financial transactions represented, in whole or in part, the proceeds of a specified unlawful activity (that is, distribution of controlled substances), and knowing that the transactions were designed, in whole or in part, to conceal or disguise the nature,

location, source, ownership, and control of the proceeds of specified unlawful activity; all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and (h).

COUNT THREE

7 U.S.C. § 2156 and 18 U.S.C. § 371

Conspiracy to Engage in an Animal Fighting Venture (Dogfighting)

Beginning at a date unknown to the grand jury, but no later than July 2020 and continuing up to and including October 31, 2023, in the Southern District of Indiana and elsewhere, GREGORY HENDERSON JR. a/k/a Grego a/k/a Whitey, Christopher Norfolk a/k/a Chris Lacy, Maurice Ervin a/k/a Big Moe, MICHAEL SANDERS a/k/a Lil Mike, James Croons a/k/a James a/k/a Lil James, Charles Richardson III a/k/a Chuck, LANDON JONES a/k/a The Comedian, Edward Bronaugh a/k/a Ted the Transporter, Donovan Tipler, Marvin Johnson JR. a/k/a Lil Big, Ryan Hicks, Brent Hutchinson, Marven Carswell, Robert Hamer, III, ERNEST YOUNG, Daymond Mason, Willie Lee, THOMAS RAYFORD a/k/a Tayda, REMY ADAMS a/k/a June, and TITUS LAWLER, defendants herein, did knowingly conspire together and with diverse other persons, known and unknown to the Grand Jury, to commit certain offenses against the United States, to wit:

1. Knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49; and

2. Knowingly buying, selling, delivering, possessing, training, and transporting an animal for participation in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(b) and Title 18, United States Code, Section 49.

MANNER AND MEANS OF THE CONSPIRACY

3. The members of the conspiracy used various manners and means to effect the object and purpose of the conspiracy, including but not limited to:

4. As part of the conspiracy, the defendants and their co-conspirators purchased, received, bred, trained, conditioned, transported, and/or delivered dogs for the purpose of entering them in animal fighting ventures.

5. It was further part of the conspiracy that the defendants and their co-conspirators used and possessed property for housing, training, and raising dogs involved in animal fighting.

6. It was further part of the conspiracy that the defendants and their co-conspirators promoted, sponsored, handled, exhibited, and paid for dogs in animal fights that affected interstate commerce.

OVERT ACTS

7. In furtherance of the conspiracy and to accomplish the object of the conspiracy, that is to engage in an animal fighting venture the members of the conspiracy did commit, among others, the following overt acts:

8. On or about July 12, 2020, Marven Carswell engaged a dog in an animal fighting venture, which was video recorded.

9. On or about August 7, 2020, Edward Bronaugh filed Articles of Organization for a Domestic Limited Liability Company known as Roll & Hold Pet Express LLC.

10. On or about September 16, 2020, Ryan Hicks engaged a dog in an animal fighting venture, which was video recorded.

11. On or about December 3, 2020, LANDON JONES and ERNEST YOUNG engaged dogs in an animal fighting venture, which was video recorded.

12. On or about December 10, 2020, Donovan Tipler sent a video to Charles Richardson that displayed a dog fight; in this videotaped dog fight, one dog killed another dog in a very quick fashion. Upon receiving the video, Richardson replied to Tipler that he wanted to acquire the dog that had killed the other dog.

13. Beginning in 2021 and continuing through August 31, 2023, LANDON JONES maintained a secondary residence on Barry Road in Indianapolis, Indiana where he housed his fighting dogs; on multiple occasions in the course of this conspiracy, JONES hosted dog fights at this same location.

14. On or about January 19, 2022, Donovan Tipler and Charles Richardson conversed about a coming dog fight, in which both had decided to bet on the same dog.

15. On or about February 6, 2022, Charles Richardson communicated with Edward Bronaugh, letting Bronaugh know that he had provided people with Bronaugh's contact information, so they could use Bronaugh as their fighting dog transporter.

16. On or about February 9, 2022, James Croons and Maurice Ervin engaged dogs in an animal fighting venture, which was video recorded.

17. On or about February 28, 2022, Ryan Hicks and MICHAEL SANDERS engaged dogs in an animal fighting venture, which was video recorded.

18. On or about May 14, 2022, Ryan Hicks and Brent Hutchinson engaged dogs in an animal fighting venture, which was video recorded.

19. On or about May 14, 2022, Ryan Hicks and Robert Hamer III engaged dogs in an animal fighting venture, which was video recorded.

20. On or about June 26, 2022, Maurice Ervin and Daymond Mason engaged dogs in an animal fighting venture, which was video recorded.

21. On or about June 27, 2022, Maurice Ervin and Donovan Tipler engaged dogs in an animal fighting venture, which was video recorded.

22. On or about July 3, 2022, Maurice Ervin and Edward Bronaugh engaged dogs in an animal fighting venture, which was video recorded.

23. On or about July 25, 2022, James Croons and Charles Richardson engaged dogs in an animal fighting venture, which was video recorded.

24. On or about August 7, 2022, Donovan Tipler engaged a dog in an animal fighting venture, which was video recorded.

25. On or about August 27, 2022, Ryan Hicks and Robert Hamer III engaged dogs in an animal fighting venture, which was video recorded.

26. On or about August 28, 2022, Brent Hutchinson engaged a dog in an animal fighting venture, which was video recorded.

27. On or about February 15, 2023, LANDON JONES and Marven Carswell engaged dogs in an animal fighting venture, which was video recorded.

28. On or about February 15, 2023, LANDON JONES and Robert Hamer III engaged dogs in an animal fighting venture, which was video recorded.

29. On or about February 15, 2023, LANDON JONES and Ryan Hicks engaged dogs in an animal fighting venture, which was video recorded.

30. On or about May 31, 2023, Christopher Norfolk requested that GREGORY HENDERSON to bring Norfolk his hanging scale, so that he could weigh one of his fighting dogs.

31. On or about June 3, 2023, Christopher Norfolk hosted individuals at his house in Indianapolis, Indiana, for the purpose of fighting dogs.

32. On or about June 3, 2023, GREGORY HENDERSON subjected one of his dogs to a fight with another dog at the dog fighting venture that had been hosted by Christopher Norfolk at Norfolk's Indianapolis, Indiana residence.

33. On or about June 15, 2023, Christopher Norfolk hosted individuals at his house in Indianapolis, Indiana, for the purpose of fighting dogs; among others, GREGORY HENDERSON, MICHAEL SANDERS, Norfolk, and others attended this animal fighting venture.

34. On or about June 15, 2023, MICHAEL SANDERS advised another conspirator, Christopher Norfolk, regarding how to handle one of Norfolk's fighting dogs, advising Norfolk not to fight the dog until the dog grew older and had more training.

35. On or about July 1, 2023, MICHAEL SANDERS obtained a carpet for the purposes of finishing a dog fighting pit; after SANDERS' carpet was deemed unacceptable, James Croons was then tasked with also obtaining a carpet for purposes of placing it in a dog fighting pit, so that another animal fighting venture could be held.

36. On or about July 1, 2023, Willie Lee brought his dog "Haircut" to a location in Indianapolis, Indiana, for the purpose of having that dog fight a dog owned by Maurice Ervin; this scheduled fight ultimately did not occur.

37. On or about August 18, 2023, LANDON JONES and Ryan Hicks engaged dogs in an animal fighting venture, which was video recorded.

38. On or about August 19, 2023, Marvin Johnson JR. attended a dog fight being held at Norfolk's Indianapolis, Indiana residence, and at this animal fighting exhibition, Johnson Jr. fought one of his dogs against another dog that had been brought to the location.

39. Between approximately 2019 through August 31, 2023, THOMAS RAYFORD possessed multiple dogs for the purpose of engaging in an animal fighting venture, to include "Gretta," "Lazarus," "Coco," and others.

40. On or about July 14, 2023, Robert Hamer III sent a written communication to THOMAS RAYFORD which inquired as to whether RAYFORD had either a 34-pound female dog or a 38-pound female dog that he wanted to fight; RAYFORD replied that he had, "both."

41. In July 2023, THOMAS RAYFORD made arrangements wherein he agreed to engage in a dog fight in September 2023.

42. On or about August 28, 2022, TITUS LAWLER and Brent Hutchinson engaged dogs in an animal fighting venture in Indianapolis, Indiana, which was video recorded.

43. On or about April 16, 2023, REMY ADAMS sent LANDON JONES a text message which provided an image of a plaque that displayed the Grim Reaper standing behind a pit bull terrier with the words "The Reapers Run 2023." The plaque was intended to serve as a trophy for an upcoming dog fight. ADAMS was in the Southern District of Indiana when he sent this text message.

44. On or about May 6, 2023, ADAMS sent LANDON JONES a text message providing the location of an upcoming dog fight in Gary, Indiana.

45. On or about May 6, 2023, Robert Hamer III, LANDON JONES, Willie Lee, James Croons, Maurice Ervin, Brent Hutchinson, and others traveled from the Southern District of Indiana to Gary, Indiana for the purpose of attending a dog fight, which was promoted by ADAMS.

46. On or about August 12, 2023, ADAMS sent Marven Carswell a text message that provided Carswell an address to an Extended Stay hotel in Fort Wayne, Indiana.

47. That same day, Willie Lee, Marven Carswell and others traveled from the Southern District of Indiana to Fort Wayne, Indiana and met at an Extended Stay hotel. The coconspirators later attended a dog fight in Fort Wayne, which was promoted by ADAMS.

48. On or about July 7, 2023, ADAMS communicated with LANDON JONES via text message indicating that ADAMS could match JONES's dog up

with another dog for a fight. ADAMS was in the Southern District of Indiana when he sent this text message.

49. In or around July 2023, ADAMS began arranging a fight between Robert Hamer's dog "Roscoe" and James Croons's dog "2 Time" that was to take place in Indianapolis, Indiana. On or about July 25, 2023, ADAMS requested forfeit money for the fight by sending Robert Hamer III a text message that provided an image of ADAMS's Cash App profile. When ADAMS sent the text message, he was in the Southern District of Indiana.

50. On July 26, 2023, Robert Hamer III sent ADAMS \$250 via Cash App as forfeit money for ADAMS to hold in advance of a September 2023 dog fight that ADAMS scheduled to be held in Indianapolis, Indiana.

51. On or about August 3, 2023, Robert Hamer III sent ADAMS a text message in which Robert Hamer III stated that he knew a third-party, THOMAS RAYFORD, who wanted to gamble on an upcoming dog fight.

52. On or about August 3, 2023, ADAMS sent LANDON JONES a text message that contained an image of a dog fighting pit that was set-up in front of Willie Lee's residence. ADAMS then provided LANDON JONES the dimensions of the pit.

All in violation of Title 7, United States Code, Section 2156 and Title 18, United States Code, Section 371.

COUNT FOUR
7 U.S.C. § 2156(a)(1)
Sponsor/Exhibit Animal in Animal Fighting Venture

On or about December 3, 2020, in the Southern District of Indiana, ERNEST YOUNG and LANDON JONES, defendants herein, did knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

COUNT FIVE
7 U.S.C. § 2156(a)(1)
Sponsor/Exhibit Animal in Animal Fighting Venture

On or about February 28, 2022, in the Southern District of Indiana, Ryan Hicks and MICHAEL SANDERS, defendants herein, did knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

COUNT SIX
7 U.S.C. § 2156(a)(1)
Sponsor/Exhibit Animal in Animal Fighting Venture

On or about February 15, 2023, in the Southern District of Indiana, LANDON JONES and Marven Carswell, defendants herein, did knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

COUNT SEVEN
7 U.S.C. § 2156(a)(1)
Sponsor/Exhibit Animal in Animal Fighting Venture

On or about February 15, 2023, in the Southern District of Indiana, LANDON JONES and Robert Hamer III, defendants herein, did knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

COUNT EIGHT
7 U.S.C. § 2156(a)(1)
Sponsor/Exhibit Animal in Animal Fighting Venture

On or about February 15, 2023, in the Southern District of Indiana, LANDON JONES and Ryan Hicks, defendants herein, did knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

COUNT NINE
7 U.S.C. § 2156(a)(1)
Sponsor/Exhibit Animal in Animal Fighting Venture

On or about August 18, 2023, in the Southern District of Indiana, LANDON JONES and Ryan Hicks, defendants herein, did knowingly sponsor and exhibit an animal in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

COUNT TEN

21 U.S.C. § 841(a)(1)

Possession with Intent to Distribute Controlled Substance

On or about August 3, 2023, in the Southern District of Indiana, MICHAEL SANDERS a/k/a Lil Mike, defendant herein, knowingly and intentionally possessed with the intent to distribute controlled substances, to wit: five grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ELEVEN

21 U.S.C. § 841(a)(1)

Possession with Intent to Distribute Controlled Substance

On or about August 3, 2023, in the Southern District of Indiana, MICHAEL SANDERS a/k/a Lil Mike, defendant herein, knowingly and intentionally possessed with the intent to distribute controlled substances, to wit: a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (“fentanyl”), a Schedule II, controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

21 U.S.C. § 841(a)(1)

Possession with Intent to Distribute Controlled Substance

On or about August 3, 2023, in the Southern District of Indiana, MICHAEL SANDERS a/k/a Lil Mike, defendant herein, knowingly and intentionally possessed with the intent to distribute controlled substances, to wit: a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTEEN
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about August 31, 2023, within the Southern District of Indiana, TYRONE BELL, defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms having been shipped and transported in interstate commerce; to-wit, a Bersa semi-automatic handgun, and/or a Smith & Wesson revolver, after having sustained convictions for the following offense: Dealing in Cocaine or Narcotic Drug, a Class A felony, in Marion County, Indiana, on or about September 9, 1997.

All in violation of Title 18 United States Code, Section 922(g)(1).

COUNT FOURTEEN
21 U.S.C. § 841(a)(1)
Possession with Intent to Distribute Controlled Substance

On or about August 31, 2023, in the Southern District of Indiana, LANDON JONES a/k/a The Comedian, defendant herein, knowingly and intentionally possessed with the intent to distribute controlled substances; to wit: 50 grams of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTEEN
21 U.S.C. § 841(a)(1)
Possession with Intent to Distribute Controlled Substance

On or about August 31, 2023, in the Southern District of Indiana, LANDON JONES a/k/a The Comedian, defendant herein, knowingly and

intentionally possessed with the intent to distribute controlled substances; to wit: 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II, controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTEEN
21 U.S.C. § 841(a)(1)

Possession with Intent to Distribute Controlled Substance

On or about August 31, 2023, in the Southern District of Indiana, LANDON JONES a/k/a The Comedian, defendant herein, knowingly and intentionally possessed with the intent to distribute controlled substances; to wit: a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTEEN
18 U.S.C. § 924(c)

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about August 31, 2023, in the Southern District of Indiana, LANDON JONES a/k/a The Comedian, defendant herein, did knowingly possess a firearm, that is, a Ruger 57 semi-automatic firearm, a Century Arms Draco semi-automatic firearm, a Springfield XDS-9 semi-automatic firearm, and/or a Glock 43 semi-automatic firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession

with intent to distribute controlled substances; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT EIGHTEEN
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about August 31, 2023, within the Southern District of Indiana, MICHAEL SANDERS a/k/a Lil Mike, defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms having been shipped and transported in interstate commerce; to-wit, a Maverick 88 12 gauge shotgun, and/or a Radical Firearms, LLC Model RF-15 firearm, after having sustained convictions for the following offenses: Dealing in Cocaine, B Felony, Marion County, Indiana, on or about November 16, 2006; Abandonment/Neglect of Vertebrate Animal, D Felony, Marion County, Indiana, on or about June 8, 2004; and Dealing in Cocaine, A Felony, Marion County, Indiana, on or about July 31, 2003.

All in violation of Title 18 United States Code, Section 922(g)(1).

COUNT NINETEEN
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about June 25, 2024, within the Southern District of Indiana, THOMAS RAYFORD a/k/a Tayda, defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year,

did knowingly possess one or more firearms having been shipped and transported in interstate commerce; to-wit, an Arsenal KP SAMS, 7.62mm rifle, and/or a Springfield Armory SAINT, 5.56 NATO rifle, and/or a Taurus G2C Model PT111G2A handgun and/or a Smith & Wesson Model SW40VE handgun, after having sustained convictions for the following felony offense(s):

Intimidation, in Madison County, Indiana, on or about January 3, 2000;

Escape, in Madison County, Indiana, on or about December 11, 2000;

Dealing in Cocaine, in Madison County, Indiana, Cause Number 48D03-0605-FB-000236, on or about March 5, 2007;

Dealing in Cocaine, in Madison County, Indiana, Cause Number 48D03-0609-FA-000415, on or about March 5, 2007; and/or

Unlawful Possession of a Firearm by a Serious Violent Felon, in Madison County, Indiana on or about April 2, 2012;

All in violation of Title 18 United States Code, Section 922(g)(1).

COUNT TWENTY
7 U.S.C. § 2156(a)(1)
Sponsor/Exhibit Animal in Animal Fighting Venture

On or about August 28, 2022, in the Southern District of Indiana, TITUS LAWLER, the defendant herein, did knowingly sponsor and exhibit animals in an animal fighting venture, in and affecting interstate commerce, in violation of Title 7, United States Code, Section 2156(a)(1) and Title 18, United States Code, Section 49.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Twenty of the Second Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 982, Title 7, United States Code, Section 2156 as incorporated by Title 28 United States Code, Section 2461, and Title 18, Section 924.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense charged in Counts One, Ten, Eleven, Twelve, Fourteen, Fifteen, and Sixteen, in violation of Title 21, United States Code, Section 841, RAMIRO RICO DE LEON a/k/a Rami, GREGORY HENDERSON, JR. a/k/a Grego a/k/a Whitey, OCTAVIO VICENCIO, ERICK FOSTER, GEORGE TAYLOR, J.C. Smith, DONTORIA GILBERT, DAVID BENNETT, Gregory Easter, Lauren Eggert, and Quoshawn Stewart, MICHAEL SANDERS a/k/a Lil Mike, LANDON JONES a/k/a The Comedian and Brent Hutchinson, the defendants herein, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

3. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense charged in Count Two, in violation of Title 18, United States Code, Section 1956, RAMIRO RICO DE LEON a/k/a Rami and GREGORY HENDERSON JR. a/k/a Grego a/k/a Whitey, the defendants herein, shall forfeit

to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

4. Upon conviction of the offense charged in Count Three, in violation of Title 7, United States Code, Section 2156, GREGORY HENDERSON JR. a/k/a Grego a/k/a Whitey, Christopher Norfolk a/k/a Chris Lacy, Maurice Ervin a/k/a Big Moe, MICHAEL SANDERS a/k/a Lil Mike, James Croons a/k/a James a/k/a Lil James, Charles Richardson III III a/k/a Chuck, LANDON JONES a/k/a The Comedian, Edward Bronaugh a/k/a Ted the Transporter, Donovan Tipler, Marvin Johnson Jr. a/k/a Lil Big, Ryan Hicks, Brent Hutchinson, Marven Carswell, Robert Hamer III, Ernest Young, Daymond Mason, Willie Lee, THOMAS RAYFORD, REMY ADAMS a/k/a June, and Titus Lawler, the defendants herein, shall forfeit to the United States any and all animals involved in the commission of the offense.

5. Upon conviction of the offenses charged in Counts Thirteen, Seventeen, Eighteen, and Nineteen, in violation of Title 18, United States Code, Sections 922 and 924, LANDON JONES a/k/a The Comedian, TYRONE BELL, MICHAEL SANDERS a/k/a Lil Mike, Charles Richardson III a/k/a Chuck, Ryan Hicks, Robert Hamer, and THOMAS RAYFORD, the defendants herein shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offenses.

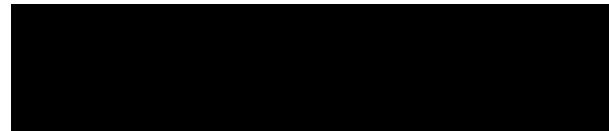
6. If any of the property described above, as a result of any act or omission

of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



FOREPERSON

THOMAS E. WHEELER II
United States Attorney

By:



Lindsay Karwoski
Adam Eakman
Assistant United States Attorneys
::KMS